

Honorable Marc L. Barreca
Chapter 11
Hearing Date: May 22, 2015
Hearing Time: 9:30 a.m.
Hearing Place: Courtroom 7106
Response Date: May 15, 2015

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re

CASEY S. SULLIVAN and STEPHANIE F.
SULLIVAN,

Debtors.

No. 10-23806-MLB

MOTION FOR ORDER FINDING THAT 11
U.S.C. § 1141(d)(5)(C) AS DEFINED IN
§ 522(Q)(1) DOES NOT APPLY TO
DEBTORS

Casey S. Sullivan and Stephanie F. Sullivan, the debtors-in-possession in this Chapter 11 case ("Debtors"), by and through counsel, J. Todd Tracy, Jamie J. McFarlane, and The Tracy Law Group PLLC, move the Court, pursuant to § 1141(d)(5)(C), for an order finding as follows:

1. That there is no reasonable cause to believe that § 522(q)(1) may be applicable to the Debtors; and
2. That there are no pending proceedings in which the Debtors may be found guilty of a felony as defined in § 522(q)(1)(A) or liable for debt defined in § 522(q)(1)(B).

MOTION FOR ORDER FINDING THAT 11 U.S.C.
§ 1141(d)(5)(C) AS DEFINED IN § 522(Q)(1) DOES NOT
APPLY TO DEBTORS - 1

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1 In support of this Motion, Debtors rely on the following authority: the Declaration of
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3 Casey S. Sullivan and the files and records in this case.
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5 WHEREFORE, the Declaration of Casey S. Sullivan and the files and record in this
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7 case indicate that § 522(q)(1)(A) and § 522(q)(1)(B) are not applicable to the Debtors in this
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9 case, the Debtors hereby request that an order be entered finding that 11 U.S.C.
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11 § 1141(d)(5)(C) as defined in § 522(Q)(1) does not apply to the Debtors.
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14 DATED this 30th day of April 2015.
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16 THE TRACY LAW GROUP PLLC
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18 By /s/ Jamie J. McFarlane
19 J. Todd Tracy, WSBA #17342
20 Jamie J. McFarlane, WSBA #41320
21 Attorneys for Debtors
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